

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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7   IN RE:

8   NATIONAL PRESCRIPTION OPIATE       MDL NO. 2804  
LITIGATION

9

      This document relates to:           Case No. 17-MD-2804

10

      All cases                           Hon. Dan A. Polster

11           \*\*\*\*\*

12                   HIGHLY CONFIDENTIAL - SUBJECT  
13                   TO FURTHER CONFIDENTIALITY REVIEW

14                   VIDEOTAPED DEPOSITION OF:

15                   RONALD LINK

16                   MOTLEY RICE

17                   55 Cedar Street

18                   Providence, Rhode Island

19                   December 11, 2018       9:09 a.m.

20

21

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1	INDEX		
2	EXAMINATION		
3	Witness Name		Page
4	RONALD LINK		
5	Direct By Mr. Baker .....		13
6	Cross By Mr. DeRoche .....		337
7			
	EXHIBITS		
8	CVS-LINK	Description	Page
9			
10	No. 36A	E-mail, CVS 000012286	18
11	No. 10A	E-mail dated January	22
12	No. 25	9, 2014	
13		Track One CVS Store	24
14		Information, Bates CVS	
15		000007362 through 7364	
16	No. 3	"Poisoning Deaths:	37
17		Opioid Analgesics"	
18	No. 60	CVS Logistics, June 6,	47
19		2014, CVS 000039935	
20		and 936	
21	No. 113	Logistics Planning	54
22		Update, CVS 000100362	
23		through 364	
24	No. 19B	E-mail, CVS 000003076	57
	No. 49	July 1, 2013 Wholesale	61
		Supply Agreement, CVS	
		000030750 through	
		30808	



1	INDEX		
2	EXHIBITS		
3	CVS-LINK	Description	Page
4	No. 50	July 1, 2009 Wholesale Supply Agreement, CVS 000030817 through 30891	65
5			
6	No. 51	January 1, 2004, Wholesale Supply Agreement, CVS 000030892 and 30995	67
7			
8	No. 102	E-mail, CVS 000091508 through 1518	73
9			
10	No. 58	SOP, Bates CVS 34375 through 34378	83
11			
12	No. 12	SOM Program, CVS 000002188 and CVS 000034375 through 378	89
13			
14	No. 89	CVS SOM, May 2014, CVS 000081680 through 1681	93
15			
16	No. 120	E-mail, CVS 000076135	95
17			
18	No. 87	SOM, January 16, 2014, CVS 000078029 through 8031	95
19			
20	No. 104	E-mail, CVS 0000103329	99
21			
22	No. 18	E-mail, CVS 00007525204 through 25259	112
23			
24	No. 48	CVS Distribution Center Policy, CVS 000024877 through 24941	116

1		INDEX	
2		EXHIBITS	
3	CVS-LINK	Description	Page
4	No. 57	E-mail, CVS 000034234 through 234	120
5			
	No. 94	E-mail, CVS 000087889 and 890	123
6			
7	No. 98	E-mail, CVS 000089188	123
8	No. 70	E-mail, CVS 000057751 through 754	124
9			
	No. 97	E-mail, CVS 000088956 with Attachment, CVS 000088957 through 9025	129
10			
11	No. 81	E-mail, CVS 000075299 with Attachment, CVS 000075300 through 75312	132
12			
13	No. 36	E-mail, CVS 000012286	146
14	No. 67	E-mail, CVS 000055834	149
15	No. 90	E-mail, CVS 000083367 with Attachment, Suspicious Order Monitoring for PSE/Control Drugs	152
16			
17	No. 71	E-mail, CVS 000057759 and 55834	155
18			
19	No. 43	E-mail, CVS 0000000022040 through 2053	157
20			
21	No. 106	E-mail, CVS 000029867 through 870	166
22			
23			
24			

1	INDEX		
2	EXHIBITS		
3	CVS-LINK	Description	Page
4	No. 107	E-mail, CVS 000022230 and 231	171
5	No. 34	Notes, CVS 000010529 through 532	187
6	No. 103	E-mail dated May 15, 2014	189
7	No. 119	Suspicious Order Monitoring Training, CVS 000106514 through 6561	198
8	No. 95	E-mail, CVS 000088523, Six Pages	202
9	No. 55	Business Idea Description, CVS 000034175 through 177	217
10	No. 82	E-mail dated October 12, 2010	222
11	No. 83	E-mail, CVS 000075564 and 542	226
12	No. 92	E-mail, CVS 0000/83064 with Attachment, Five Pages	232
13	No. 53	E-mail, CVS 000033579 through 581	248
14	No. 62	E-mail, CVS 000055298 through 302	255
15	No. 54	E-mail, CVS 000034168 through 171	258
16			
17			
18			
19			
20			
21			
22			
23			
24			

1		INDEX	
2		EXHIBITS	
3	CVS-LINK	Description	Page
4	No. 85	E-mail, CVS 000076114 through 117	264
5			
6			
7	No. 108	CVS DEA Visit 8/5 to 8/8/2013, CVS 000008389 through 8395	283
8			
9	No. 68	E-mail, CVS 000057736 through 738	286
10			
11	No. 40B	E-mail, CS 000017250, Nine Pages	305
12			
13	No. 111	E-mail, CVS 000099706 through 709	308
14	No. 105	SOM Risk Analysis, CVS 000103343	322
15			
16	No. 35	Memorandum, CVS 000010542 and 543	333
17	No. 221	E-mail, CVS 000103859 and 3867	337
18			
19	No. 222	CVS 3322 - Brookpark Rd., Cleveland, OH, Orders of HCPs	342
20			
21	No. 223	Brookpark RD CVS Orders Places to IN DC	345
22	No. 201	Hydrocodone Shipments: CVS Pharmacy No. 3322	353
23			
24	No. 213	E-mail, CVS 000106598 through 601	357

1 THE VIDEOGRAPHER: We are now on  
2 the record. My name is Robert Martignetti.  
3 I'm a videographer for Golkow Litigation  
4 Services. Today's date is December 11, 2018,  
5 and the time is 9:09 a.m.

6 This video deposition is being held in  
7 Providence, Rhode Island In Re: National  
8 Prescription Opiate Litigation. The deponent  
9 is Ron Link. Counsel will be noted on the  
10 stenographic record.

11 The court reporter is Darlene Coppola  
12 and will now swear in the witness.

13  
14 RONALD LINK,  
15 witness, having first been  
16 satisfactorily identified and duly sworn,  
17 testifies and states as follows:

18  
19 DIRECT EXAMINATION

20 BY MR. BAKER:

21 Q. Your name is Ronald Link?

22 A. Yes, it is.

23 Q. Could you tell us the date of today?

24 A. December 11th.

1           Q.    Could you tell us what day of the week  
2           it is?

3           A.    It is -- gee, Tuesday.

4           Q.    Okay.  Those were direct questions.  
5           Those were direct answers.  And that's what  
6           I'm here to do, is to ask you direct questions  
7           and get direct answers.  The reason I say that  
8           is because during the deposition, oftentimes  
9           witnesses will take off in a direction of ten  
10          or twelve sentences to answer a really direct  
11          question that calls for a really direct  
12          answer.

13                So, for example, I asked you what day  
14          of the week it was and you gave me a day.  I  
15          asked you what date it was, you gave me a  
16          date.

17                So as we go through this deposition  
18          and I ask you direct questions that have  
19          keywords, like dates --

20          A.    Yeah.

21          Q.    -- and days and times, that's what I'm  
22          looking for.

23                Fair enough?

24          A.    Yeah.

1 Q. So you are what with CVS?

2 A. I am no longer employed with CVS.

3 Q. When were you employed with CVS?

4 A. I was employed until this past  
5 December 2017.

6 Q. You were employed from when to when?

7 A. 1994 to 2017.

8 Q. During the period of 1994 through  
9 2017, what positions did you hold and on what  
10 dates did you hold those positions?

11 A. First three years, '94 to '97, I was  
12 the director of operations for the Lumberton  
13 DC.

14 Q. When you say DC, that's an acronym for  
15 distribution center?

16 A. Distribution center.

17 Q. You understand that a jury will be  
18 hearing what your testimony is today. So when  
19 you use acronyms, you have to speak up and  
20 tell me what those acronyms are. Correct?

21 A. Correct.

22 Q. So when we say DC throughout this  
23 deposition, you're talking about distribution  
24 center?

1           A.    Distribution center.

2           Q.    When we say SOM, we're talking about  
3           suspicious order monitoring, correct?

4           A.    Correct.

5           Q.    When we talk about SOP, we're talking  
6           about standards of procedure; is that right?

7           A.    Correct.

8           Q.    Standard operating procedures?

9           A.    Standard operating procedures.

10          Q.    When we talk about P&P, we're talking  
11          about policy and procedure, correct?

12          A.    Correct.

13          Q.    So when we say an SOM, P&P, all those  
14          acronyms, you understand what we're talking  
15          about, correct?

16          A.    Correct.

17          Q.    So go ahead and tell me from 1994  
18          until when, you were what?

19          A.    1994 until I think it was 2007, I was  
20          vice president of logistics. And then from  
21          2007 through 2017, I was senior VP of  
22          logistics.

23          Q.    Vice president of logistics would be  
24          what in relation to the hierarchy of logistics



1 at CVS?

2 A. I reported into a senior vice  
3 president of logistics. So it would be --

4 Q. What senior -- I'm sorry. Go ahead.

5 A. Yeah, so I -- I would probably -- I  
6 would be viewed as the number two person, I  
7 guess.

8 Q. And then from 2007 to 2017, you were  
9 the number one person with respect to  
10 logistics at CVS; is that correct?

11 A. That's correct.

12 Q. There are multiple different CVS names  
13 of corporations.

14 Which CVS did you work for from 2007  
15 through 2017?

16 A. The CVS Pharmacy.

17 Q. CVS Pharmacy is located where?

18 A. Woonsocket, Rhode Island.

19 Q. That's where the corporate offices  
20 are, correct?

21 A. Correct.

22 Q. And the distribution centers that you  
23 were in charge of as the number one person  
24 from 2007 through 2017, that's where the CVS

1           suspicious order monitoring program was run  
2           for narcotics; is that correct?

3                           MR. BUSH:  Objection.

4           BY MR. BAKER:

5                   Q.    Is that right?

6                           Let me rephrase the question.

7                           Did the logistics department that you  
8           were head of from 2007 through 2017 own the  
9           suspicious order monitoring program?

10                   A.   Not -- not that entire period of time.

11                   Q.    During what period of time did  
12           logistics own that program?

13                   A.    We got directly involved with that  
14           around 2012, I believe the date was.

15                   Q.    Let me show you what's marked as  
16           exhibit -- let me show you what's marked as  
17           Exhibit 36A.

18  
19                           (Exhibit No. 36A marked for  
20           identification.)

21

22           BY MR. BAKER:

23                   Q.    This is an e-mail from Mr. Mark  
24           Nicastro to you dated 8/18/13.  And in the

1           last paragraph it says, "I know Tom and Craig  
2           want the process in Woonsocket, and if they're  
3           going to own it, staff it, and manage it,  
4           fine. My understanding is logistics owns this  
5           process, so either Dan or I have it."

6                           MR. BUSH: Dean, I think you  
7           meant.

8           BY MR. BAKER:

9                   Q.    "Dean or I have it."  
10                   Did I state that correct?

11                  A.    Correct.

12                  Q.    So what that means is that at least we  
13           know that in 2015 that logistics owned the SOM  
14           process; is that correct?

15                  A.    That's correct.

16                  Q.    And you say that they started owning  
17           it -- the logistics department started owning  
18           it when?

19                  A.    The transition, I believe, was roughly  
20           the year prior.

21                  Q.    In 2012?

22                  A.    2012.

23                  Q.    Which department owned the SOM process  
24           before it was transferred to logistics?

1 A. Loss prevention.

2 Q. Where is loss prevention located?

3 A. In Woonsocket, Rhode Island.

4 Q. Who was the head of loss prevention  
5 during the period of time that the SOM process  
6 was run out of Woonsocket?

7 A. Judy Hughes.

8 Q. Where is Judy Hughes today?

9 A. I believe she's still in Woonsocket.

10 Q. When you were vice president of  
11 logistics before you became senior vice  
12 president, were you in contact with Judy  
13 Hughes regarding the SOM program or not?

14 A. I don't recall.

15 Q. Sir?

16 A. I do not recall.

17 Q. During the period of time that you  
18 were senior vice president from 2007 through  
19 2017 of logistics, were you in touch with Amy  
20 Propatier, the DEA compliance coordinator for  
21 CVS?

22 A. Not directly.

23 Q. Did you even know that she held the  
24 position of DEA's compliance coordinator?

1 A. Yes, I did.

2 Q. Did you ever have any communication  
3 with her?

4 A. Not directly, no.

5 Q. During the period of time that the  
6 suspicious order monitoring program was owned  
7 by the logistics department at CVS from 2012  
8 through 2014, when you were employed there,  
9 you had no communication with the DEA  
10 compliance coordinator, which at that time was  
11 Amy Propatier?

12 A. Not directly.

13 Q. What about indirectly?

14 A. I don't recall. I don't recall.

15 Q. So you don't recall any communication  
16 with the DEA compliance coordinator when you  
17 were the senior vice president of logistics at  
18 CVS when the logistics department owned the  
19 suspicious order monitoring program, correct?

20 A. Correct.

21 Q. Let me show you Document No. 10A.

22 This is an e-mail.

23

24

1 (Exhibit No. 10A marked for  
2 identification.)

3

4 BY MR. BAKER:

5 Q. This is an e-mail from Dean Vanelli to  
6 you, Ronald Link, dated 1/9/2014.

7 At the bottom it says, "Suspicious  
8 order monitoring program," it says, "assumed  
9 ownership of suspicious order monitoring  
10 program."

11 We know from your testimony at least  
12 that the suspicious order monitoring program  
13 was owned by logistics in 2012, correct?

14 A. Correct.

15 Q. So this is not accurate that the  
16 assumption of the ownership was in 2014. The  
17 assumption of the ownership was in 2012.  
18 Correct?

19 MR. BUSH: Objection.

20 BY MR. BAKER:

21 Q. Does that make sense?

22 A. (Witness reviews document.)

23 Q. Is that yes or no?

24 A. I'm just not clear on the dates right

1 now. I apologize.

2 Q. We'll move on.

3 But from your recollection, it was in  
4 2012 that logistics started to own the SOM  
5 program; is that correct?

6 A. I believe that was the date where the  
7 transition took place.

8 Q. Would anybody be higher up in  
9 logistics than you during the period of time  
10 that the SOM program was owned by logistics  
11 from 2012 to 2014?

12 A. I was the senior person in logistics.

13 Q. So the answer is nobody would have  
14 been higher up than you?

15 A. No.

16 Q. Correct?

17 A. No.

18 Q. As the person the highest up in  
19 logistics in charge of SOM, the suspicious  
20 order monitoring program -- I want to make it  
21 clear -- you never once remember communicating  
22 with the DEA compliance coordinator, which was  
23 Amy Propatier, correct?

24 A. Correct.

1 Q. And you never really knew that she was  
2 DEA compliance coordinator, did you?

3 MR. BUSH: Objection.

4 A. I knew she was the DEA compliance  
5 coordinator.

6 BY MR. BAKER:

7 Q. You never really knew what she did or  
8 didn't do with that title, correct?

9 A. I did not interact with her.

10 Q. Let me direct you to Exhibit No. 25,  
11 please. This is a list of CVS stores in Ohio.

12 Are these CVS stores ones that were  
13 served by CVS distribution centers?

14  
15 (Exhibit No. 25 marked for  
16 identification.)

17  
18 A. I -- I believe so. I mean, I have --  
19 I don't -- I'm not sure. I mean, from looking  
20 at the addresses, I'm not sure. I really  
21 don't know.

22 BY MR. BAKER:

23 Q. Well, let me ask you something. Would  
24 there be anybody, other than CVS distribution



1           centers, that would have primarily distributed  
2           narcotics to CVS pharmacies during the period  
3           of time that you were employed at CVS?

4           A.   Wholesalers would have been.

5           Q.   How about with respect to hydrocodone,  
6           which were class 3 narcotics?

7           A.   At that time, it was CVS.

8           Q.   CVS had distribution centers  
9           throughout the United States that you managed,  
10          correct?

11          A.   Correct.

12          Q.   There were 19 total distribution  
13          centers; is that correct?

14          A.   Currently.

15          Q.   And during the period of time that you  
16          managed those distribution centers, those  
17          distribution centers, at least some of them,  
18          had class 3 narcotics licenses to distribute  
19          narcotics, correct?

20          A.   That is correct.

21          Q.   Did all of them, or did just some of  
22          them?

23          A.   They all had class 3.

24          Q.   And class 3 narcotics, up until

1 November -- excuse me -- October 6 of 2014,  
2 included hydrocodone and hydrocodone  
3 combination products; is that correct?

4 A. Correct.

5 Q. Class 2 products included OxyContin,  
6 oxycodone, and those related products; is that  
7 correct?

8 A. Correct.

9 Q. So the class 2 narcotic products were  
10 supplied to CVS pharmacies throughout the  
11 United States by outside vendors, correct?

12 A. Correct.

13 Q. And those outside vendors included  
14 people like McKesson, correct?

15 A. Correct.

16 Q. And it included people like Cardinal,  
17 correct?

18 A. Correct.

19 Q. It included people like Mallinckrodt;  
20 is that correct?

21 A. I am not aware of that.

22 Q. You're not aware?

23 A. No.

24 Q. We'll get into those documents in just

1 a few moments.

2 A. Yes, yes.

3 Q. So the class 3 narcotics, which would  
4 have been hydrocodone combination products,  
5 those were purchased from whom by the  
6 distribution centers to be stored in the  
7 distribution centers? Who were they purchased  
8 from?

9 A. The purchasing department within CVS.

10 Q. Where would they purchase them from?

11 A. From the manufacturers, I believe.

12 Q. So from various outside vendors,  
13 correct?

14 A. Yes.

15 Q. And then once they were stored in CVS  
16 distribution centers throughout the United  
17 States, at some point there were orders made  
18 by each pharmacy throughout the United States  
19 to those distribution centers for those  
20 narcotics to be distributed and supplied to  
21 those -- sent to those pharmacies, correct?

22 A. Correct.

23 Q. And those pharmacies numbered what  
24 during the period of time that you were there,

1 ranging from when you -- when you started  
2 until the time that you quit?

3 A. Could you clarify the question?

4 Q. Okay. You started working -- well,  
5 let's cover the period of time from 2006 until  
6 2014.

7 A. Okay.

8 Q. How many CVS pharmacies were there,  
9 approximately, in 2006 that your company  
10 distributed to and then how many did that end  
11 up being in 2014?

12 A. I don't recall the exact number in  
13 2006.

14 Q. Could you give us the range?  
15 Approximately 7,000?

16 A. Yeah. I was going to say maybe 6,000  
17 stores, I would say.

18 Q. And then in 2014, that was up to over  
19 9,700; is that correct?

20 A. I believe it's about that number,  
21 yeah.

22 Q. So during the period of time that you  
23 were the senior vice president of logistics,  
24 from 2007 until 2014, we're talking about

1           between 18 and 19 distribution centers at that  
2           time, correct?

3           A.    We did not have 19 distribution  
4           centers, but we had -- I think we had 17  
5           distribution centers.

6           Q.    Well, at some point, it bumped up to  
7           19, correct?

8           A.    Correct.

9           Q.    Kansas City was the last one that you  
10          opened?

11          A.    Recently.

12          Q.    Last year, correct?

13          A.    Correct.

14          Q.    And during this period of time, each  
15          one of those distribution centers had a  
16          process through which the pharmacies  
17          throughout the United States that were CVS  
18          pharmacies would order their narcotics, their  
19          class 3 narcotics, the hydrocodones and  
20          hydrocodone combination products, from CVS  
21          distribution centers, correct?

22          A.    Could you ask the question again?

23          Q.    During the period of time from 2007 to  
24          2014 that you were senior vice president of

1 logistics --

2 A. Right.

3 Q. -- in charge of the suspicious order

4 monitoring program --

5 A. Right.

6 Q. -- at CVS --

7 A. Right.

8 MR. BUSH: Objection. Go ahead.

9 MR. BAKER: What's the

10 objection?

11 MR. BUSH: I don't think that's

12 what he said. He said he was in charge of the

13 suspicious order monitoring program.

14 BY MR. BAKER:

15 Q. When were you -- when were you senior

16 vice president of logistics at CVS?

17 MR. BUSH: That's not what I'm

18 saying. But...

19 BY MR. BAKER:

20 Q. When were you senior vice president of

21 logistics at CVS?

22 A. At 2007 through 2017.

23 Q. Okay. During the period of time that

24 you were senior vice president of logistics at

1 CVS, did CVS pharmacies order primarily their  
2 hydrocodone combination products and class 3  
3 narcotics from CVS distribution centers?

4 A. Primarily, I would say no.

5 Q. Okay. Who primarily did those  
6 pharmacies order class 3 narcotics from?

7 A. The wholesalers.

8 Q. So those would be called outside  
9 vendors, correct?

10 A. Correct.

11 Q. So did the outside vendors then supply  
12 more quantities of narcotics to those  
13 pharmacies during that time frame than CVS  
14 distribution centers did?

15 A. I don't know. I don't know the  
16 quantities.

17 Q. When I meant primarily, I meant  
18 primarily who was the one that a pharmacy  
19 would pick up the phone and call in order to  
20 make an order?

21 A. The wholesalers.

22 Q. And then secondarily, they would call  
23 the CVS distribution centers?

24 A. There was a period -- there was a

1 transition period where CVS did not carry, you  
2 know...

3 Q. Class 3?

4 A. Class -- class, you know...

5 Q. So let's go from --

6 MR. BUSH: Can I -- excuse me.

7 Can I ask both of you to make sure that you  
8 each let the other finish, because I think  
9 it's -- you're both talking over each other.

10 MR. BAKER: No problem.

11 BY MR. BAKER:

12 Q. And if you think I'm overstepping you  
13 in your answer, hold your hand up and I'll let  
14 you finish.

15 A. Yeah.

16 Q. Fair enough?

17 A. Yeah.

18 Q. So from 2007 to 2014 when you were  
19 senior vice president of logistics, there  
20 was -- during that period of time from 2007  
21 through October 6 of 2014, hydrocodone  
22 combination products were considered  
23 Schedule III narcotics, correct?

24 A. Correct.



1 Q. There was a change in the scheduling  
2 October 6, 2014 where HCPs or hydrocodone  
3 combination products were scheduled upward by  
4 the FDA to Schedule II?

5 A. Correct.

6 Q. So what I'm asking is, during the  
7 period of time from 2007 to 2014, October --

8 A. Correct.

9 Q. -- when HCPs were Schedule IIIs --

10 A. Correct.

11 Q. -- did CVS pharmacies order those  
12 hydrocodone combination products from outside  
13 vendors other than CVS distribution centers?

14 A. They did also order from outside  
15 vendors, correct.

16 Q. And did they order as much or more  
17 from outside vendors than they did from CVS  
18 distribution centers, or do you know?

19 A. I don't know.

20 Q. In addition to ordering from outside  
21 vendors, did the CVS pharmacies, during that  
22 time frame from 2007 through 2014 October,  
23 order from CVS distribution centers when  
24 they -- when they needed Schedule III

1           narcotics?

2           A.     Yes.

3           Q.     And my question relates back to this  
4           Exhibit No. 25, which is the list of Track 1  
5           CVS stores which are in Ohio.

6                     Did the CVS distribution centers, to  
7           your knowledge, during the period of 2007  
8           through 2014, October, supply class 3  
9           narcotics, including hydrocodone combination  
10          products, to that list of CVS stores?

11                    MR. BUSH:  Objection.

12          BY MR. BAKER:

13          Q.     To your knowledge?

14          A.     My difficulty is not knowing whether  
15          or not these addresses are the CVS stores,  
16          but...

17          Q.     I want you to assume --

18          A.     Yeah.

19          Q.     -- for the sake of my question that --  
20          I've handed you Exhibit No. 25, assume that  
21          that's the list of stores in what's called the  
22          Track 1 CVS, which would be -- which would be  
23          inclusive of Summit County, Ohio and Cuyahoga  
24          County, Ohio.

1 A. Okay.

2 Q. I want you to assume that.

3 A. Okay.

4 Q. I want you to assume -- I'm asking  
5 you, for the period of 2007 through 2014,  
6 October, did CVS distribution centers supply  
7 hydrocodone combination products to that list  
8 of stores, if that is a list of Track 1  
9 stores?

10 A. If this is the accurate list, the  
11 answer would be yes.

12 Q. Okay. Thank you.

13 Now, during the period of time that  
14 you were employed by CVS, the CVS pharmacies  
15 sold both Schedule II narcotics and Schedule  
16 III narcotics, is that correct?

17 A. Correct.

18 Q. Then from the period of October 2014  
19 when the Schedule III narcotics of HCPs,  
20 hydrocodone combination products, were then  
21 rescheduled to Schedule IIs, at that point,  
22 all of the narcotics that were sold by CVS  
23 pharmacies in Schedule IIs were provided by or  
24 supplied by outside vendors, correct?

1 A. Correct.

2 Q. Now, narcotics are controlled  
3 substances under federal law. You know that,  
4 right?

5 A. Yes.

6 Q. And you know that controlled  
7 substances, in order to distribute those, you  
8 have to have a certain type of license from  
9 the DEA, correct?

10 A. Correct.

11 Q. And you understand, as senior vice  
12 president of logistics or prior senior vice  
13 president of logistics, that that requires the  
14 distribution centers to follow the rules  
15 related to what DEA lays down for distribution  
16 centers, correct?

17 A. Correct.

18 Q. Now, you're aware that during the  
19 period of time of 2006, at the very least  
20 2006, there was a period thereafter where  
21 there was a build-up of the opioid crisis,  
22 correct?

23 A. I -- I'm not -- I'm not sure about  
24 what's defined as a build-up. I mean...

1 Q. Are you familiar that this country is  
2 in the midst of an opioid crisis?

3 A. Yes, I am.

4 Q. Are you familiar that that's been  
5 going on for at least the past ten years?

6 A. Yes.

7 Q. Are you familiar with the statistics  
8 related to that?

9 A. I am not.

10 MR. BAKER: Could you please  
11 pull up the charts, the DEA charts, please, in  
12 sequence.

13 I'm on Plaintiffs' Exhibit 3.

14

15 (Exhibit No. 3 marked for  
16 identification.)

17

18 BY MR. BAKER:

19 Q. I'm going to show you -- well, first  
20 of all, you know who the DEA is -- the US DEA  
21 is, correct?

22 A. Correct.

23 Q. That's the United States Drug  
24 Enforcement Administration, which governs the

1 regulation of narcotics, correct?

2 A. Correct.

3 Q. Now, are you familiar with the  
4 poisoning deaths of opioid analgesics having  
5 increased virtually every single year from  
6 1999 through 2013?

7 A. I am not.

8 Q. Are you familiar with the fact that,  
9 for instance, in 2007, when you became senior  
10 vice president of logistics, that there were  
11 14,440 -- 14,459 deaths from opioid  
12 analgesics?

13 MR. BUSH: Objection.

14 BY MR. BAKER:

15 Q. Did you know that?

16 A. I did not.

17 Q. Is that what that chart indicates to  
18 you?

19 A. It does, yeah.

20 Q. Assuming this chart to be correct, did  
21 you know that, during the period of time that  
22 you were senior vice president of logistics at  
23 CVS, that the opioid deaths increased to a  
24 peak of over 16,000 per year between 2010 and

1           2013?

2           A.    I was not aware of that.

3           Q.    Are you aware of how many people are  
4           dying today?

5           A.    I do not know the stat.

6           Q.    Is this something that you studied  
7           about when you were senior vice president of  
8           logistics at CVS in charge of the suspicious  
9           order monitoring program?

10          A.    I did not study it, no.

11          Q.    Did you ever try to familiarize  
12          yourself with the extent of the crisis and the  
13          extent of the deaths that were occurring in  
14          the United States as a result of opioids?

15          A.    I did not.

16          Q.    Did you realize that these opioids  
17          that were causing these deaths were  
18          distributed through CVS pharmacies?

19                   MR. BUSH:  Objection.

20          BY MR. BAKER:

21          Q.    Or distributed to CVS pharmacies?

22                   MR. BUSH:  Objection.

23          BY MR. BAKER:

24          Q.    Did you know that?

1 MR. BUSH: Objection.

2 BY MR. BAKER:

3 Q. Yes?

4 A. Yes.

5 Q. Okay. Did you know that -- go to the  
6 next one -- that the International Narcotics  
7 Control Board gathered statistics in 2012 as  
8 to who was consuming the highest amount of  
9 hydrocodone in the world? Did you know that?

10 A. I did not.

11 Q. Did you know that the United States,  
12 according to the statistics kept by the DEA  
13 and this chart, was the country with the  
14 highest -- with the highest consumption of  
15 hydrocodone, which is -- which is 99 percent  
16 of global consumption?

17 A. I'm not aware of that.

18 Q. Okay. Did you know that CVS sold or  
19 that your distribution centers that you were  
20 in charge of during the period of 2007 through  
21 2014 distributed hydrocodone combination  
22 products to CVS pharmacies that account for  
23 part of that 99 percent?

24 A. Yes.



1           Q.    Let me ask you to look at the next  
2           chart.  It's entitled "United States Rates of  
3           Opioid Overdose Deaths, Sales, and Treatment  
4           Admissions of 1999 to 2010."

5                   Do you see that chart in front of  
6           you?

7           A.    I do.

8           Q.    Do you see that there are three lines.  
9           One is green on the top.  One is red in the  
10          middle.  One is blue on the bottom.

11                   Do you see that chart?

12          A.    I do.

13          Q.    Have you ever seen this chart before?

14          A.    I have not.

15          Q.    I want you to assume that these are  
16          statistics that were gathered by the United  
17          States DEA and charted as such.

18                   Do you see that the top number there,  
19          the top line is called "Opioid sales"?

20                   Do you see that?

21          A.    I do.

22          Q.    And do you understand that the middle  
23          line is opioid deaths, the red line?

24          A.    I do.

1           Q.    Do you see that those lines run  
2           parallel to each other?

3           A.    I do.

4           Q.    Do they correlate with each other, to  
5           the best of your knowledge, from looking at  
6           that chart?

7           A.    Visually, they correlate.

8           Q.    Is there, according to this visual  
9           correlation, an opioid sales and opioid deaths  
10          correlation such that the higher the degree of  
11          sales of opioids during this period of time,  
12          the higher degree of deaths during this period  
13          of time?

14                That's a yes or no.

15          A.    I'd say yes.

16          Q.    Let's go to the next document.

17                The next document discusses the 2012  
18          Ohio drug overdose deaths.

19                Do you see that?

20          A.    Yes.

21          Q.    Can I switch with you for just a  
22          second. Let me see that one that's yellowed  
23          in.

24                Do you see on the top here, it says

1           that "Drug overdose deaths continue to be a  
2           public health crisis in Ohio, with a 366  
3           percent increase in the number of deaths from  
4           2000 to 2012"?

5           A.    Yes.

6           Q.    Okay.  Were you aware of that when you  
7           were working at CVS?

8                   Were you aware of this statistic?

9           A.    I was not.

10          Q.    Were you aware of any of the  
11          statistics that I showed you in the other  
12          charts --

13          A.    No.

14          Q.    -- from the DEA?

15          A.    I was not.

16          Q.    Skip down four bullet points.  Bullet  
17          Point No. 4 and 5.

18                   Do you see her where it says "Opioids  
19          prescription or heroin remain the driving  
20          factor behind the unintentional drug overdose  
21          epidemic in Ohio, that approximately  
22          two-thirds, or 1,272, of the drug overdoses  
23          involved any opioid in 2012, similar to 2011."

24                   Did you know that?

1           A.    I did not.

2           Q.    Do you know that these statistics were  
3           gathered by the Ohio Department of Health,  
4           Office of Vital Statistics analysis conducted  
5           by the Injury Prevention Program? Did you  
6           know that?

7           A.    I did not.

8           Q.    Did anybody ever show you these  
9           statistics, or did you ever try to study these  
10          statistics when you were employed by CVS in  
11          charge of the suspicious order monitoring  
12          program?

13          A.    No.

14          Q.    Did the opioid crisis and the  
15          statistics associated with the opioid crisis  
16          have any concern of you while you were  
17          employed by CVS as the senior vice president  
18          in charge of logistics?

19                   Did that concern you at all?

20          A.    It -- I'd say yes. Yeah.

21          Q.    If it concerned you, then, why did you  
22          not attempt to do any research on it to see  
23          the extent of the problem?

24          A.    I had -- I had people directly

1 responsible for managing all that detail.

2 MR. BUSH: Go ahead. You can  
3 answer. It looked like Bill was going to  
4 interrupt you. I just wanted to make sure you  
5 got to answer the question.

6 BY MR. BAKER:

7 Q. But you were never told by those  
8 people what the research showed; is that what  
9 you're saying?

10 A. That's correct.

11 Q. Pull out the next chart, please. This  
12 is called the drug diversion map.

13 MR. BUSH: I think you took the  
14 exhibit from him.

15 MR. BAKER: I'm sorry. Let's  
16 see that one back, please.

17 BY MR. BAKER:

18 Q. This is called a "Drug Diversion Map,  
19 Migration Out of Florida."

20 Have you ever seen this map before?

21 A. I have not.

22 Q. This map -- your lawyer can explain,  
23 because we've gone over this in  
24 Miss Propatier's deposition -- this map is

1 something that is a CVS document.

2 Did you know that?

3 A. I did not.

4 Q. Did you know that this map was  
5 contained within CVS files, the drug diversion  
6 migration out of Florida map?

7 A. I did not.

8 Q. Have you ever heard of the opioid or  
9 OxyContin Express?

10 A. I have not.

11 Q. Have you ever heard of something  
12 called the Opioid Express?

13 A. No.

14 Q. Are you familiar with the concept of  
15 migration of opioids out of Florida up through  
16 states north of there, inclusive of Ohio? Are  
17 you familiar with that?

18 A. I am not.

19 Q. Nobody ever attempted to explain that  
20 this exists?

21 A. I'm not familiar with it.

22 MR. BAKER: Let me see that  
23 back, if I could. Actually, you can have it.

24 Give me Exhibit 60, please.

1

2

(Exhibit No. 60 marked for

3

identification.)

4

5

BY MR. BAKER:

6

Q. I'm handing you Exhibit 60. This is a

7

list of CVS logistics distribution centers in

8

existence as of June of 2014; is that correct?

9

A. Correct.

10

Q. And it lists 19 distribution centers,

11

correct?

12

A. Correct.

13

Q. Now, you -- did you resign from CVS?

14

A. I retired from CVS.

15

Q. You retired?

16

A. Yeah.

17

Q. What month did you retire?

18

A. December.

19

Q. Of 2014?

20

A. '17.

21

Q. '17. I'm sorry.

22

So this is a complete list of all the

23

distribution centers in the United States even

24

as of now; is that correct? With the

1           exception of Kansas City.

2           A.     Correct.

3           Q.     Is that right?

4           A.     Correct.

5           Q.     Kansas City is not on this list, and

6           Kansas City would make it number 20; is that

7           right?

8           A.     Correct.

9           Q.     So right now, to your knowledge, there

10          are 20 distribution centers of CVS throughout

11          the United States?

12          A.     Yes.

13          Q.     Is that correct?

14          A.     There is no DC in Puerto Rico.

15          Q.     So there are 19 distribution centers,

16          but Puerto Rico is what?

17          A.     Puerto Rico, we had stores, but we did

18          not have a distribution center there.

19          Q.     Did the suspicious order monitoring

20          system that was run through your department

21          from 2007 through 2014, when you were employed

22          there, did it include transactions to stores

23          in Puerto Rico or not?

24                       MR. BUSH:  Objection.  That



1 misstates the record.

2 A. I'm not aware of that.

3 BY MR. BAKER:

4 Q. Were there CVS retail stores in Puerto  
5 Rico?

6 A. I don't recall when we opened up  
7 stores in Puerto Rico.

8 Q. Were there pharmacies in Puerto Rico?

9 A. Yes.

10 Q. When do you believe, to the best of  
11 your recollection, there were pharmacies in  
12 Puerto Rico?

13 A. I don't recall. I don't recall.

14 Q. When there were pharmacies in Puerto  
15 Rico during your time at CVS, did CVS supply  
16 from its distribution centers any narcotics to  
17 Puerto Rico pharmacies?

18 A. No.

19 Q. When you were employed at CVS, did the  
20 Puerto Rico retailers, the Puerto Rico  
21 pharmacies order all of their narcotics,  
22 class 2s and class 3s, from outside vendors?

23 A. Yes.

24 Q. During the period of time that you

1           were employed at CVS, did any of those drugs  
2           that were supplied to the Puerto Rico  
3           pharmacies run through the suspicious order  
4           monitoring system at CVS?

5           A.    I am -- I don't know.

6           Q.    You don't recall having seen any of  
7           that, do you?

8           A.    I don't.

9           Q.    So Puerto Rico was an outlier on its  
10          own relative to whether anybody was or wasn't  
11          going to monitor that in the context of CVS's  
12          efforts; is that correct?

13          A.    Yeah, I'm not aware, yeah.

14          Q.    Insofar as the suspicious order  
15          monitoring system that your department owned  
16          from 2012 through 2014 when you were there, it  
17          was responsible for doing the suspicious order  
18          monitoring of all narcotics that were received  
19          by the pharmacies in the CVS chain throughout  
20          the United States; is that correct?

21                       MR. BUSH:  Objection.

22          A.    I'm not 100 percent sure, yeah.

23          BY MR. BAKER:

24          Q.    Now, you were the person most senior

1 in the logistics department that was in charge  
2 of the suspicious order monitoring system from  
3 2012 through 2014, correct?

4 A. Correct.

5 Q. My question is was that department in  
6 charge of monitoring suspicious orders by all  
7 of the CVS pharmacies throughout the United  
8 States?

9 A. I'm not sure. Again, your -- I don't  
10 know. I'm not clear.

11 Q. It was a nationwide suspicious order  
12 monitoring system, correct?

13 A. Correct.

14 Q. It wasn't something that was  
15 distribution center to distribution center in  
16 2012, was it?

17 It was all in Indiana at that point,  
18 was it not?

19 A. Correct.

20 Q. Okay. So it centralized in the  
21 Indiana distribution center, correct?

22 A. Correct.

23 Q. And that's -- that's a logistics  
24 department?

1 A. Correct.

2 Q. Where you were in charge of,  
3 correct?

4 A. Correct.

5 Q. So my question is did that  
6 distribution center run the suspicious order  
7 monitoring system for the entire United  
8 States?

9 A. At that time yes, yes.

10 Q. And so any narcotics that were ordered  
11 by any CVS pharmacy, that's what you were in  
12 charge of monitoring in Indiana, correct?

13 MR. BUSH: Objection.

14 BY MR. BAKER:

15 Q. Is that right?

16 A. The -- yeah, I --

17 MR. BUSH: You can answer the  
18 question.

19 A. I am not sure, because of the  
20 outside -- outside vendor component.

21 BY MR. BAKER:

22 Q. So let me ask it this way: With  
23 respect to class 3 narcotics, which would have  
24 included hydrocodone combination products up

1           until October 2014 --

2           A.     Correct.

3           Q.     -- all of the suspicious order

4           monitoring that was done for the class 3

5           narcotics was run out of one distribution

6           center, which was Indiana from 2012 to 2014;

7           is that correct?

8           A.     That is correct.

9           Q.     And that would include all of the

10          class 3 narcotics that would have been ordered

11          through CVS distribution centers, correct?

12          A.     Correct.

13          Q.     That would have also included all of

14          the class 3 narcotics that were ordered

15          through outside vendors by CVS pharmacies,

16          correct?

17          A.     I'm not sure. I'm not clear on that.

18          Q.     We'll get into that in a minute.

19          A.     All right.

20          Q.     So are you familiar with even what the

21          suspicious order monitoring system monitored,

22          whether it be just those class 3 narcotics

23          that were ordered from CVS distribution

24          centers or if it also included the CVS outside

1 vendors or not?

2 Do you know or have any idea?

3 A. I'm not clear -- not sure.

4 Q. But, again, you were the senior person  
5 in charge of that program, right?

6 A. I was the senior person responsible  
7 for the entire logistics organization.

8 Q. Okay.

9 A. And let me clarify. That was not my  
10 sole responsibility, also. But I...

11 MR. BAKER: Could you hand me  
12 Exhibit 113, please.

13

14 (Exhibit No. 113 marked for  
15 identification.)

16

17 MR. BAKER: Off the record for a  
18 quick break.

19 THE VIDEOGRAPHER: The time is  
20 9:48 a.m., and we're off the record.

21

22 (Brief recess.)

23

24 THE VIDEOGRAPHER: The time is



1 Q. It states, "SOM process will include  
2 store controlled substances, orders placed  
3 with CVS warehouses and outside vendors,  
4 Cardinal and McKesson," correct?

5 A. Correct.

6 Q. So we know from looking at this,  
7 July 8, 2013, that prospectively at least, the  
8 plan was at that time to include outside  
9 vendors, correct?

10 A. Correct.

11 Q. And up until that time, outside vendor  
12 purchases by CVS pharmacies were not being  
13 monitored by CVS; is that correct?

14 A. Again, I was not -- I'm not aware --  
15 I'm not aware that it wasn't.

16 Q. At least according to the document,  
17 that's what it indicates; is that right?

18 A. Correct.

19 Q. And these are the same stores that  
20 were purchasing narcotics that were for sale  
21 retail to the United States public; is that  
22 correct?

23 A. Correct.

24 Q. And those included class 3 narcotics;





[illegible]

[illegible]

1           Q.   Well, if the purpose of the system is  
2           to prevent diversion and there's no system in  
3           place to do it --

4           A.   Yeah.

5           Q.   -- then naturally, the chances of  
6           diversion increase, correct?

7           A.   Yes.   Yeah.

8           Q.   So, see, that's one of those questions  
9           that has a logical answer.   So I appreciate  
10          you answering it logically rather than trying  
11          to do the dance.   Okay?

12                   MR. BUSH:   Objection to the  
13          speech by counsel.

14          BY MR. BAKER:

15          Q.   So these narcotics that have a higher  
16          opportunity for diversion when they are not  
17          being monitored, those are the same narcotics,  
18          according to the DEA, that are causing deaths  
19          in this opioid crisis, correct?

20          A.   Correct.

21          Q.   And those are the same narcotics that  
22          are sold by CVS pharmacies, correct?

23          A.   Correct.

24          Q.   And those are the same narcotics that

█ [REDACTED]

█ [REDACTED]

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5 MR. BAKER: Could you go to

6 No. 58, please.

█ [REDACTED]

█

█ [REDACTED]

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- **1. Introduction**
- **2. Background**
- **3. Methodology**
- **4. Results**
- **5. Discussion**
- **6. Conclusion**
- **7. References**
- **8. Appendix**
- **9. Glossary**
- **10. Acknowledgments**
- **11. Bibliography**
- **12. Index**
- **13. Summary**
- **14. Abstract**
- **15. Introduction**
- **16. Background**
- **17. Methodology**
- **18. Results**
- **19. Discussion**
- **20. Conclusion**
- **21. References**
- **22. Appendix**
- **23. Glossary**
- **24. Acknowledgments**
- **25. Bibliography**
- **26. Index**
- **27. Summary**
- **28. Abstract**
- **29. Introduction**
- **30. Background**
- **31. Methodology**
- **32. Results**
- **33. Discussion**
- **34. Conclusion**
- **35. References**
- **36. Appendix**
- **37. Glossary**
- **38. Acknowledgments**
- **39. Bibliography**
- **40. Index**
- **41. Summary**
- **42. Abstract**
- **43. Introduction**
- **44. Background**
- **45. Methodology**
- **46. Results**
- **47. Discussion**
- **48. Conclusion**
- **49. References**
- **50. Appendix**
- **51. Glossary**
- **52. Acknowledgments**
- **53. Bibliography**
- **54. Index**
- **55. Summary**
- **56. Abstract**
- **57. Introduction**
- **58. Background**
- **59. Methodology**
- **60. Results**
- **61. Discussion**
- **62. Conclusion**
- **63. References**
- **64. Appendix**
- **65. Glossary**
- **66. Acknowledgments**
- **67. Bibliography**
- **68. Index**
- **69. Summary**
- **70. Abstract**
- **71. Introduction**
- **72. Background**
- **73. Methodology**
- **74. Results**
- **75. Discussion**
- **76. Conclusion**
- **77. References**
- **78. Appendix**
- **79. Glossary**
- **80. Acknowledgments**
- **81. Bibliography**
- **82. Index**
- **83. Summary**
- **84. Abstract**
- **85. Introduction**
- **86. Background**
- **87. Methodology**
- **88. Results**
- **89. Discussion**
- **90. Conclusion**
- **91. References**
- **92. Appendix**
- **93. Glossary**
- **94. Acknowledgments**
- **95. Bibliography**
- **96. Index**
- **97. Summary**
- **98. Abstract**
- **99. Introduction**
- **100. Background**
- **101. Methodology**
- **102. Results**
- **103. Discussion**
- **104. Conclusion**
- **105. References**
- **106. Appendix**
- **107. Glossary**
- **108. Acknowledgments**
- **109. Bibliography**
- **110. Index**
- **111. Summary**
- **112. Abstract**
- **113. Introduction**
- **114. Background**
- **115. Methodology**
- **116. Results**
- **117. Discussion**
- **118. Conclusion**
- **119. References**
- **120. Appendix**
- **121. Glossary**
- **122. Acknowledgments**
- **123. Bibliography**
- **124. Index**
- **125. Summary**
- **126. Abstract**
- **127. Introduction**
- **128. Background**
- **129. Methodology**
- **130. Results**
- **131. Discussion**
- **132. Conclusion**
- **133. References**
- **134. Appendix**
- **135. Glossary**
- **136. Acknowledgments**
- **137. Bibliography**
- **138. Index**
- **139. Summary**
- **140. Abstract**
- **141. Introduction**
- **142. Background**
- **143. Methodology**
- **144. Results**
- **145. Discussion**
- **146. Conclusion**
- **147. References**
- **148. Appendix**
- **149. Glossary**
- **150. Acknowledgments**
- **151. Bibliography**
- **152. Index**
- **153. Summary**
- **154. Abstract**
- **155. Introduction**
- **156. Background**
- **157. Methodology**
- **158. Results**
- **159. Discussion**
- **160. Conclusion**
- **161. References**
- **162. Appendix**
- **163. Glossary**
- **164. Acknowledgments**
- **165. Bibliography**
- **166. Index**
- **167. Summary**
- **168. Abstract**
- **169. Introduction**
- **170. Background**
- **171. Methodology**
- **172. Results**
- **173. Discussion**
- **174. Conclusion**
- **175. References**
- **176. Appendix**
- **177. Glossary**
- **178. Acknowledgments**
- **179. Bibliography**
- **180. Index**
- **181. Summary**
- **182. Abstract**
- **183. Introduction**
- **184. Background**
- **185. Methodology**
- **186. Results**
- **187. Discussion**
- **188. Conclusion**
- **189. References**
- **190. Appendix**
- **191. Glossary**
- **192. Acknowledgments**
- **193. Bibliography**
- **194. Index**
- **195. Summary**
- **196. Abstract**
- **197. Introduction**
- **198. Background**
- **199. Methodology**
- **200. Results**
- **201. Discussion**
- **202. Conclusion**
- **203. References**
- **204. Appendix**
- **205. Glossary**
- **206. Acknowledgments**
- **207. Bibliography**
- **208. Index**
- **209. Summary**
- **210. Abstract**
- **211. Introduction**
- **212. Background**
- **213. Methodology**
- **214. Results**
- **215. Discussion**
- **216. Conclusion**
- **217. References**
- **218. Appendix**
- **219. Glossary**
- **220. Acknowledgments**
- **221. Bibliography**
- **222. Index**
- **223. Summary**
- **224. Abstract**
- **225. Introduction**
- **226. Background**
- **227. Methodology**
- **228. Results**
- **229. Discussion**
- **230. Conclusion**
- **231. References**
- **232. Appendix**
- **233. Glossary**
- **234. Acknowledgments**
- **235. Bibliography**
- **236. Index**
- **237. Summary**
- **238. Abstract**
- **239. Introduction**
- **240. Background**
- **241. Methodology**
- **242. Results**
- **243. Discussion**
- **244. Conclusion**
- **245. References**
- **246. Appendix**
- **247. Glossary**
- **248. Acknowledgments**
- **249. Bibliography**
- **250. Index**
- **251. Summary**
- **252. Abstract**
- **253. Introduction**
- **254. Background**
- **255. Methodology**
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12 Q. Let me show you Exhibit No. 50.

13

14 (Exhibit No. 50 marked for

15 identification.)

16

17 BY MR. BAKER:

18 Q. This is a document entitled "Wholesale

19 Supply Agreement, July 1, 2009." Do you see

20 that? Between Cardinal Health and CVS, Inc.

21 Do you see that in the first

22 paragraph?

23 A. I do.

24 Q. The Bates number on this is 30817,

1 correct? At the bottom?

2 A. Correct. Correct.

3 Q. And this is dated July 1, 2009,

4 correct?

5 A. Correct.

6 Q. All right. And you see on page 30840

7 in that agreement, but I'll show it to you

8 right here -- do you see on page 30817 in that

9 agreement that it is signed by CVS Pharmacy,

10 Inc., 7/1/2009?

11 Do you see that?

12 A. I do.

13 Q. This is signed by CVS Pharmacy

14 Purchasing and Pharmaceutical Relations,

15 correct?

16 A. Correct.

17 Q. Is that who does the purchasing of

18 these outside vendor supply --

19 A. Yes.

20 Q. -- of narcotics to CVS pharmacies?

21 A. Yes.

22 Q. And you're not made aware of that when

23 these purchases are going on, correct?

24 A. Correct.

1 Q. And so you really have no idea during  
2 the period of time that you were in charge of  
3 the suspicious order monitoring program and  
4 logistics just the extent to which these  
5 outside vendors were providing narcotics to  
6 CVS pharmacies; is that correct?

7           A.     That is correct.



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- **1. Introduction**
- **2. Background**
- **3. Methodology**
- **4. Results**
- **5. Discussion**
- **6. Conclusion**
- **7. References**
- **8. Appendix**
- **9. Bibliography**
- **10. Glossary**
- **11. Index**
- **12. Acknowledgments**
- **13. Executive Summary**
- **14. Abstract**
- **15. Introduction**
- **16. Background**
- **17. Methodology**
- **18. Results**
- **19. Discussion**
- **20. Conclusion**
- **21. References**
- **22. Appendix**
- **23. Bibliography**
- **24. Glossary**
- **25. Index**
- **26. Acknowledgments**
- **27. Executive Summary**
- **28. Abstract**
- **29. Introduction**
- **30. Background**
- **31. Methodology**
- **32. Results**
- **33. Discussion**
- **34. Conclusion**
- **35. References**
- **36. Appendix**
- **37. Bibliography**
- **38. Glossary**
- **39. Index**
- **40. Acknowledgments**
- **41. Executive Summary**
- **42. Abstract**
- **43. Introduction**
- **44. Background**
- **45. Methodology**
- **46. Results**
- **47. Discussion**
- **48. Conclusion**
- **49. References**
- **50. Appendix**
- **51. Bibliography**
- **52. Glossary**
- **53. Index**
- **54. Acknowledgments**
- **55. Executive Summary**
- **56. Abstract**
- **57. Introduction**
- **58. Background**
- **59. Methodology**
- **60. Results**
- **61. Discussion**
- **62. Conclusion**
- **63. References**
- **64. Appendix**
- **65. Bibliography**
- **66. Glossary**
- **67. Index**
- **68. Acknowledgments**
- **69. Executive Summary**
- **70. Abstract**
- **71. Introduction**
- **72. Background**
- **73. Methodology**
- **74. Results**
- **75. Discussion**
- **76. Conclusion**
- **77. References**
- **78. Appendix**
- **79. Bibliography**
- **80. Glossary**
- **81. Index**
- **82. Acknowledgments**
- **83. Executive Summary**
- **84. Abstract**
- **85. Introduction**
- **86. Background**
- **87. Methodology**
- **88. Results**
- **89. Discussion**
- **90. Conclusion**
- **91. References**
- **92. Appendix**
- **93. Bibliography**
- **94. Glossary**
- **95. Index**
- **96. Acknowledgments**
- **97. Executive Summary**
- **98. Abstract**
- **99. Introduction**
- **100. Background**
- **101. Methodology**
- **102. Results**
- **103. Discussion**
- **104. Conclusion**
- **105. References**
- **106. Appendix**
- **107. Bibliography**
- **108. Glossary**
- **109. Index**
- **110. Acknowledgments**
- **111. Executive Summary**
- **112. Abstract**
- **113. Introduction**
- **114. Background**
- **115. Methodology**
- **116. Results**
- **117. Discussion**
- **118. Conclusion**
- **119. References**
- **120. Appendix**
- **121. Bibliography**
- **122. Glossary**
- **123. Index**
- **124. Acknowledgments**
- **125. Executive Summary**
- **126. Abstract**
- **127. Introduction**
- **128. Background**
- **129. Methodology**
- **130. Results**
- **131. Discussion**
- **132. Conclusion**
- **133. References**
- **134. Appendix**
- **135. Bibliography**
- **136. Glossary**
- **137. Index**
- **138. Acknowledgments**
- **139. Executive Summary**
- **140. Abstract**
- **141. Introduction**
- **142. Background**
- **143. Methodology**
- **144. Results**
- **145. Discussion**
- **146. Conclusion**
- **147. References**
- **148. Appendix**
- **149. Bibliography**
- **150. Glossary**
- **151. Index**
- **152. Acknowledgments**
- **153. Executive Summary**
- **154. Abstract**
- **155. Introduction**
- **156. Background**
- **157. Methodology**
- **158. Results**
- **159. Discussion**
- **160. Conclusion**
- **161. References**
- **162. Appendix**
- **163. Bibliography**
- **164. Glossary**
- **165. Index**
- **166. Acknowledgments**
- **167. Executive Summary**
- **168. Abstract**
- **169. Introduction**
- **170. Background**
- **171. Methodology**
- **172. Results**
- **173. Discussion**
- **174. Conclusion**
- **175. References**
- **176. Appendix**
- **177. Bibliography**
- **178. Glossary**
- **179. Index**
- **180. Acknowledgments**
- **181. Executive Summary**
- **182. Abstract**
- **183. Introduction**
- **184. Background**
- **185. Methodology**
- **186. Results**
- **187. Discussion**
- **188. Conclusion**
- **189. References**
- **190. Appendix**
- **191. Bibliography**
- **192. Glossary**
- **193. Index**
- **194. Acknowledgments**
- **195. Executive Summary**
- **196. Abstract**
- **197. Introduction**
- **198. Background**
- **199. Methodology**
- **200. Results**
- **201. Discussion**
- **202. Conclusion**
- **203. References**
- **204. Appendix**
- **205. Bibliography**
- **206. Glossary**
- **207. Index**
- **208. Acknowledgments**
- **209. Executive Summary**
- **210. Abstract**
- **211. Introduction**
- **212. Background**
- **213. Methodology**
- **214. Results**
- **215. Discussion**
- **216. Conclusion**
- **217. References**
- **218. Appendix**
- **219. Bibliography**
- **220. Glossary**
- **221. Index**
- **222. Acknowledgments**
- **223. Executive Summary**
- **224. Abstract**
- **225. Introduction**
- **226. Background**
- **227. Methodology**
- **228. Results**
- **229. Discussion**
- **230. Conclusion**
- **231. References**
- **232. Appendix**
- **233. Bibliography**
- **234. Glossary**
- **235. Index**
- **236. Acknowledgments**
- **237. Executive Summary**
- **238. Abstract**
- **239. Introduction**
- **240. Background**
- **241. Methodology**
- **242. Results**
- **243. Discussion**
- **244. Conclusion**
- **245. References**
- **246. Appendix**
- **247. Bibliography**
- **248. Glossary**
- **249. Index**
- **250. Acknowledgments**
- **251. Executive Summary**
- **252. Abstract**
- **253. Introduction**
- **254. Background**
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3 MR. BAKER: We've been going on  
4 for an hour and a half, so we'll take a  
5 break.

6 THE VIDEOGRAPHER: The time is  
7 10:24 a.m., and we're off the record.

8

9 (Off the record at 10:24 a.m.)

10

11 (Exhibit No. 120 marked for  
12 identification.)

13

14 THE VIDEOGRAPHER: The time is 10:37  
15 a.m. We're on the record.

16

17 BY MR. BAKER:

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- **1. Introduction**
- **2. Background**
- **3. Methodology**
- **4. Results**
- **5. Discussion**
- **6. Conclusion**
- **7. References**
- **8. Appendix**
- **9. Glossary**
- **10. Acknowledgments**
- **11. Bibliography**
- **12. Index**
- **13. Summary**
- **14. Abstract**
- **15. Introduction**
- **16. Background**
- **17. Methodology**
- **18. Results**
- **19. Discussion**
- **20. Conclusion**
- **21. References**
- **22. Appendix**
- **23. Glossary**
- **24. Acknowledgments**
- **25. Bibliography**
- **26. Index**
- **27. Summary**
- **28. Abstract**
- **29. Introduction**
- **30. Background**
- **31. Methodology**
- **32. Results**
- **33. Discussion**
- **34. Conclusion**
- **35. References**
- **36. Appendix**
- **37. Glossary**
- **38. Acknowledgments**
- **39. Bibliography**
- **40. Index**
- **41. Summary**
- **42. Abstract**
- **43. Introduction**
- **44. Background**
- **45. Methodology**
- **46. Results**
- **47. Discussion**
- **48. Conclusion**
- **49. References**
- **50. Appendix**
- **51. Glossary**
- **52. Acknowledgments**
- **53. Bibliography**
- **54. Index**
- **55. Summary**
- **56. Abstract**
- **57. Introduction**
- **58. Background**
- **59. Methodology**
- **60. Results**
- **61. Discussion**
- **62. Conclusion**
- **63. References**
- **64. Appendix**
- **65. Glossary**
- **66. Acknowledgments**
- **67. Bibliography**
- **68. Index**
- **69. Summary**
- **70. Abstract**
- **71. Introduction**
- **72. Background**
- **73. Methodology**
- **74. Results**
- **75. Discussion**
- **76. Conclusion**
- **77. References**
- **78. Appendix**
- **79. Glossary**
- **80. Acknowledgments**
- **81. Bibliography**
- **82. Index**
- **83. Summary**
- **84. Abstract**
- **85. Introduction**
- **86. Background**
- **87. Methodology**
- **88. Results**
- **89. Discussion**
- **90. Conclusion**
- **91. References**
- **92. Appendix**
- **93. Glossary**
- **94. Acknowledgments**
- **95. Bibliography**
- **96. Index**
- **97. Summary**
- **98. Abstract**
- **99. Introduction**
- **100. Background**
- **101. Methodology**
- **102. Results**
- **103. Discussion**
- **104. Conclusion**
- **105. References**
- **106. Appendix**
- **107. Glossary**
- **108. Acknowledgments**
- **109. Bibliography**
- **110. Index**
- **111. Summary**
- **112. Abstract**
- **113. Introduction**
- **114. Background**
- **115. Methodology**
- **116. Results**
- **117. Discussion**
- **118. Conclusion**
- **119. References**
- **120. Appendix**
- **121. Glossary**
- **122. Acknowledgments**
- **123. Bibliography**
- **124. Index**
- **125. Summary**
- **126. Abstract**
- **127. Introduction**
- **128. Background**
- **129. Methodology**
- **130. Results**
- **131. Discussion**
- **132. Conclusion**
- **133. References**
- **134. Appendix**
- **135. Glossary**
- **136. Acknowledgments**
- **137. Bibliography**
- **138. Index**
- **139. Summary**
- **140. Abstract**
- **141. Introduction**
- **142. Background**
- **143. Methodology**
- **144. Results**
- **145. Discussion**
- **146. Conclusion**
- **147. References**
- **148. Appendix**
- **149. Glossary**
- **150. Acknowledgments**
- **151. Bibliography**
- **152. Index**
- **153. Summary**
- **154. Abstract**
- **155. Introduction**
- **156. Background**
- **157. Methodology**
- **158. Results**
- **159. Discussion**
- **160. Conclusion**
- **161. References**
- **162. Appendix**
- **163. Glossary**
- **164. Acknowledgments**
- **165. Bibliography**
- **166. Index**
- **167. Summary**
- **168. Abstract**
- **169. Introduction**
- **170. Background**
- **171. Methodology**
- **172. Results**
- **173. Discussion**
- **174. Conclusion**
- **175. References**
- **176. Appendix**
- **177. Glossary**
- **178. Acknowledgments**
- **179. Bibliography**
- **180. Index**
- **181. Summary**
- **182. Abstract**
- **183. Introduction**
- **184. Background**
- **185. Methodology**
- **186. Results**
- **187. Discussion**
- **188. Conclusion**
- **189. References**
- **190. Appendix**
- **191. Glossary**
- **192. Acknowledgments**
- **193. Bibliography**
- **194. Index**
- **195. Summary**
- **196. Abstract**
- **197. Introduction**
- **198. Background**
- **199. Methodology**
- **200. Results**
- **201. Discussion**
- **202. Conclusion**
- **203. References**
- **204. Appendix**
- **205. Glossary**
- **206. Acknowledgments**
- **207. Bibliography**
- **208. Index**
- **209. Summary**
- **210. Abstract**
- **211. Introduction**
- **212. Background**
- **213. Methodology**
- **214. Results**
- **215. Discussion**
- **216. Conclusion**
- **217. References**
- **218. Appendix**
- **219. Glossary**
- **220. Acknowledgments**
- **221. Bibliography**
- **222. Index**
- **223. Summary**
- **224. Abstract**
- **225. Introduction**
- **226. Background**
- **227. Methodology**
- **228. Results**
- **229. Discussion**
- **230. Conclusion**
- **231. References**
- **232. Appendix**
- **233. Glossary**
- **234. Acknowledgments**
- **235. Bibliography**
- **236. Index**
- **237. Summary**
- **238. Abstract**
- **239. Introduction**
- **240. Background**
- **241. Methodology**
- **242. Results**
- **243. Discussion**
- **244. Conclusion**
- **245. References**
- **246. Appendix**
- **247. Glossary**
- **248. Acknowledgments**
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- **9. Glossary**
- **10. Acknowledgments**
- **11. Bibliography**
- **12. Index**
- **13. Table of Contents**
- **14. Executive Summary**
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- **16. Introduction**
- **17. Background**
- **18. Methodology**
- **19. Results**
- **20. Discussion**
- **21. Conclusion**
- **22. References**
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- **24. Glossary**
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A horizontal bar chart with 20 rows. Each row has a small black square on the left and a horizontal bar of varying length to its right. The bars represent percentages of respondents for different categories. The lengths of the bars vary significantly, with some being very short and others nearly spanning the width of the chart area.

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Category	Percentage
Category 1	85%
Category 2	95%
Category 3	70%
Category 4	55%

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Category	Percentage
Very important	10%
Important	30%
Not important	60%
Don't know	10%

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods used to collect and analyze data. It includes a detailed description of the sampling process and the statistical techniques employed to interpret the results.

3. The third part of the document presents the findings of the study. It shows that there is a significant correlation between the variables being studied, which supports the hypothesis that was tested.

4. The fourth part of the document discusses the implications of the findings for future research and practice. It suggests that the results could be used to inform policy decisions and to guide the development of new programs and initiatives.

5. The fifth part of the document provides a conclusion and a summary of the key points. It reiterates the importance of the study and the need for further research in this area.

6. The sixth part of the document includes a list of references to the sources used in the study. It also includes a list of appendices that provide additional information and data.

7. The seventh part of the document is a glossary of terms that are used throughout the document. It defines the key concepts and provides a clear understanding of the terminology used.

8. The eighth part of the document is a list of figures and tables that are included in the study. It provides a clear overview of the data presented and allows the reader to easily locate the information they need.

9. The ninth part of the document is a list of footnotes that provide additional information and references. It includes a list of sources that were used to support the findings of the study.

10. The tenth part of the document is a list of acknowledgments that thank the individuals and organizations that provided support and assistance during the study.

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**Figure 1** | **Flowchart of the study design.** The flowchart illustrates the study design, starting with 1000 patients in the first cohort, 1000 patients in the second cohort, and 1000 patients in the third cohort. The first cohort is divided into two groups: 500 patients in the first group and 500 patients in the second group. The second cohort is divided into two groups: 500 patients in the first group and 500 patients in the second group. The third cohort is divided into two groups: 500 patients in the first group and 500 patients in the second group. The flowchart shows the progression of patients through the study, with 1000 patients in the first cohort, 1000 patients in the second cohort, and 1000 patients in the third cohort. The flowchart also shows the progression of patients through the study, with 1000 patients in the first cohort, 1000 patients in the second cohort, and 1000 patients in the third cohort.

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- **2. Background**
- **3. Methodology**
- **4. Results**
- **5. Discussion**
- **6. Conclusion**
- **7. References**
- **8. Appendix**
- **9. Glossary**
- **10. Acknowledgments**
- **11. Bibliography**
- **12. Index**
- **13. Summary**
- **14. Abstract**
- **15. Introduction**
- **16. Background**
- **17. Methodology**
- **18. Results**
- **19. Discussion**
- **20. Conclusion**
- **21. References**
- **22. Appendix**
- **23. Glossary**
- **24. Acknowledgments**
- **25. Bibliography**
- **26. Index**
- **27. Summary**
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- **29. Introduction**
- **30. Background**
- **31. Methodology**
- **32. Results**
- **33. Discussion**
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- **35. References**
- **36. Appendix**
- **37. Glossary**
- **38. Acknowledgments**
- **39. Bibliography**
- **40. Index**
- **41. Summary**
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- **43. Introduction**
- **44. Background**
- **45. Methodology**
- **46. Results**
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- **51. Glossary**
- **52. Acknowledgments**
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- **143. Methodology**
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- **163. Glossary**
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- **169. Introduction**
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- **177. Glossary**
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- **219. Glossary**
- **220. Acknowledgments**
- **221. Bibliography**
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- **228. Results**
- **229. Discussion**
- **230. Conclusion**
- **231. References**
- **232. Appendix**
- **233. Glossary**
- **234. Acknowledgments**
- **235. Bibliography**
- **236. Index**
- **237. Summary**
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A horizontal bar chart with 20 rows. Each row consists of a small black square on the left and a horizontal black bar of varying length to its right. The bars represent percentages of respondents for different categories. The lengths of the bars vary significantly, with some being very short and others extending almost to the right edge of the chart area.

Category	Percentage
1	100%
2	100%
3	60%
4	80%
5	10%
6	10%
7	100%
8	10%
9	60%
10	10%
11	100%
12	10%
13	100%
14	10%
15	100%
16	10%
17	100%
18	10%
19	100%
20	10%

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- **1. Introduction**
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MR. BAKER: I'm going to turn it

5

over to my partner, Mr. Jim DeRoche. He's

6

going to go through some of that data with

7

you.

8

THE WITNESS: Okay.

9

MR. BUSH: Is this a good time

10

for a break, a five-minute break?

11

THE VIDEOGRAPHER: The time

12

is --

13

MR. BUSH: You're done, Bill?

14

MR. BAKER: Hold on.

15

MR. BUSH: Hold on.

16

(Brief pause in proceedings.)

17

MR. BAKER: I tell you what,

18

let's do one more document.

19

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114

First of all, I want to show you what

we've marked as Exhibit 221.

0

(Exhibit No. 221 marked for

identification.)

13

MR. DEROCHÉ: Let me put a

sticker on that one so it would be official.

15

MR. BUSH: What did you say it

16

16                      was?    221?

17

MR. DEROCHE: 221.

18

BY MR. DEROUCHE:

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A horizontal bar chart titled "U.S. should take action to address climate change" showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists the demographic groups, and the x-axis shows the percentage from 0 to 100. The bars are colored blue for Male and pink for Female. The data is as follows:

Age Group	Gender	Percentage
18-29	Male	85%
	Female	88%
30-49	Male	78%
	Female	82%
50-69	Male	72%
	Female	75%
70+	Male	65%
	Female	68%



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5 MR. DEROCHE: I have nothing  
6 further.

7 MR. BAKER: That's it.

8 MR. BUSH: People on the phone  
9 don't have anything? I guess, give me one  
10 second.

11 Off the record.

12 THE VIDEOGRAPHER: The time is  
13 3:26 p.m., and we're off the record.

14  
15 (Off the record at 3:26 p.m.)

16  
17 THE VIDEOGRAPHER: The time is  
18 3:27 p.m.

19 This deposition has concluded, and we  
20 are off the record.

21  
22 (Deposition concluded at 3:27 p.m.)

23

24

CERTIFICATION

I, DARLENE M. COPPOLA, a Notary Public, do hereby  
certify that RONALD LINK, after having satisfactorily  
identifying himself, came before me on the 11th day of  
December, 2018 in Providence, Rhode Island, and was by me  
duly sworn to testify to the truth and nothing but the  
truth as to his knowledge touching and concerning the  
matters in controversy in this cause; that he was  
thereupon examined upon her oath and said examination  
reduced to writing by me; and that the statement is a true  
record of the testimony given by the witness, to the best  
of my knowledge and ability.

I further certify that I am not a relative or  
employee of counsel/attorney for any of the parties, nor a  
relative or employee of such parties, nor am I financially  
interested in the outcome of the action.

WITNESS MY HAND THIS 14th day of December, 2018.

DARLENE M. COPPOLA

My commission expires:

NOTARY PUBLIC

November 11, 2022

REGISTERED MERIT REPORTER

CERTIFIED REALTIME REPORTER

1                               IN THE UNITED STATES DISTRICT COURT  
2                               FOR THE NORTHERN DISTRICT OF OHIO  
3                               EASTERN DIVISION  
4  
5

6                   \*\*\*\*\*

7           IN RE:  
8           NATIONAL PRESCRIPTION OPIATE  
          LITIGATION  
9

          This document relates to:

10           All cases  
11

          \*\*\*\*\*

12  
13                   I, RONALD LINK, say that I have read the foregoing  
14           deposition and hereby declare under penalty of perjury the  
15           foregoing is true and correct:  
16           (as prepared)   (as corrected on errata.)

17                   Executed this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_,  
18           at \_\_\_\_\_, \_\_\_\_\_.

19

20

21

22

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24

\_\_\_\_\_  
RONALD LINK

1 CORRECTION PAGE

2 DEPONENT: RONALD LINK

3 DATE TAKEN: DECEMBER 11, 2018

4 CASE: NATIONAL PRESCRIPTION OPIATE LITIGATION

5 \*\*\*\*\*

6 PAGE / LINE / SHOULD READ/REASON

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